

Honorable Judge Benjamin Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

CLYDE RAY SPENCER,

Plaintiff,

v.

DETECTIVE SHARON KRAUSE, and  
SERGEANT MICHAEL DAVIDSON,

Defendants.

No. C11-5424BHS

**[PROPOSED] ORDER  
GRANTING PLAINTIFF'S  
MOTION FOR LEAVE TO  
TAKE TRIAL DEPOSITIONS  
OF MENONA LANDRUM AND  
ANN LINK, Ph.D.**

**NOTICE DATE: Friday,  
November 22, 2013**

THIS MATTER coming to be heard on Plaintiff's Motion for Leave to Take Trial Depositions of Menona Landrum and Ann Link, Ph.D., and the Court having reviewed all the pleadings filed herein, including the Defendants' responsive pleadings and all pleadings filed by Plaintiff in reply, it is hereby ordered:

ORDERED, ADJUDGED AND DECREED that Plaintiff's Motion for Leave to Take Trial Depositions of Menona Landrum and Ann Link, Ph.D., is hereby GRANTED. This Court

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION  
FOR LEAVE TO TAKE TRIAL DEPOSITIONS  
(C11-5424BHS) — 1**

Kathleen T. Zellner & Associates, P.C.  
LAW OFFICES  
1901 Butterfield Road  
Suite 650  
Downers Grove, Illinois 60515  
630.955.1212 main • 630.955.1111 fax

1 further rules that Plaintiff may present the trial depositions of Menona Landrum and Ann Link,  
2 Ph.D., at trial in lieu of their live testimony, subject to the Federal Rules of Evidence.

3 DATED this \_\_\_\_ day of November, 2013.

4  
5 BENJAMIN H. SETTLE  
6 United States District Judge  
7

8 Presented by:

9 /s/ Kathleen T. Zellner  
10 Kathleen T. Zellner & Associates, P.C.  
11 Admitted *pro hac vice*  
12 1901 Butterfield Road  
Suite 650  
13 Downers Grove, Illinois 60515  
Phone: (630) 955-1212  
14 Fax: (630) 955-1111  
kathleen.zellner@gmial.com  
Attorney for Plaintiffs

15 /s/ Daniel T. Davies  
Daniel T. Davies, WSBA # 41793  
Local counsel  
David Wright Tremaine LLP  
1201 Third Avenue, Suite 2200  
Seattle, Washington 98101-3045  
Phone: (206) 757-8286  
Fax: (206) 757-7286  
Email: dandavies@dwt.com  
Attorney for Plaintiffs

DECLARATION OF SERVICE

I hereby certify that on November 5, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the attorneys of record as follows:

Guy Bogdanoich Law, Lyman, Daniel, Kamerrer & Bogdanovich, P.S. P.O. Box 11880 Olympia, WA 98508-1880 Email: gbogdanovich@lldkb.com Attorney for Defendant Sharon Krause	Jeffrey A. O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98502 Email: jeffF@fjtlaw.com Attorneys for Defendant Michael Davidson
--	---

/s/ Kathleen T. Zellner

Kathleen T. Zellner & Associates, P.C.

Admitted *pro hac vice*

1901 Butterfield Road

Suite 650

Downers Grove, Illinois 60515

Phone: (630) 955-1212

Fax: (630) 955-1111

kathleen.zellner@gmail.com

Attorney for Plaintiffs